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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION IX 75 Hawthorne Street San Francisco, CA 94105

January 13, 1999

Mr. Joseph Joyce BRAC Environmental Coordinator AC/S Environment (IAU) MCAS El Toro P. O. Box 95001 Santa Ana, CA 92709-5001

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FAX TRANSMITTAL		# of pages >
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ISN 7540-01-317-7368 5099-101	GENER	RAL SERVICES ADMINISTRATION

Re: U. S. EPA Comments on Draft Proposed Plan for Groundwater Remediation at Marine Corps Air Station El Toro

Dear Mr. Joyce:

The United States Environmental Protection Agency (EPA) has reviewed the document referenced above and we find that overall it is well written but still requires some modifications to more accurately depict remediation activities and to enable the public to better comprehend those activities.

EPA's major comments are presented below. Additional EPA comments dealing largely with sentence and paragraph restructuring will be presented at the Proposed Plan meeting later this month.

Major comments:

- 1) The Proposed Plan should mention in the heading and discuss on the first page that the remedy addresses both soil and groundwater, and is a "final" remedy.
- 2) Figure 1 on page 3 should more accurately depict the current groundwater conditions at Site 24. It appears to show TCE concentrations that are higher off station than on station. In addition, the concentrations should show levels as high as 500 ppb or higher. I recommend that a scaled down version of the plume map used by the agencies for evaluating the Site 24 pilot study be used to replace the current figure.
- 3) There should be a corresponding estimated cleanup time for each alternative presented, to better enable the public to evaluate those alternatives.
- 4) The section that describes the remediation of contaminated soil at Site 24 needs to be revised to explain that "final" cleanup goals and performance criteria are now proposed. The estimated time to achieve these goals should be also be stated.

If you have any questions, please feel free to call me at (415) 744-2210. I look forward to meeting with you to discuss EPA's other comments.

Sincerely,

Glenn R. Kistner

Remedial Project Manager

Federal Facilities Cleanup Branch

cc: Patricia Hannon, RWQCB
Gregory Hurley, RAB Co-Chair
Tayseer Mahmoud, DTSC
Andy Piszkin, SWDIV